POSTAL RATE AND FEE CHANGES, 2000

APR 10 11 01 AM '00 DOCKET NO. R2000-1
POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

REQUEST FOR PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE DIRECTED TO THE UNITED STATES POSTAL SERVICE (UPS/USPS-12) (April 10, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following request for production of documents directed to the United States Postal Service: UPS/USPS-12.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP 3400 Two Logan Square 18th & Arch Streets Philadelphia, PA 19103-2762 (215) 656-3310 (215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW Washington, DC 20036-2430 (202) 861-3900

Of Counsel.

UPS/USPS - 12. Provide the following reports listed in Library Reference USPS-

LR-I-181:

a) Office of Inspector General Reports:

Report Date	Report Number	Condition
09/03/98	1222661-AF(1)	Financial Installation Audit, Greenville, SC - work is in progress to move operations and provide the additional space needed to properly perform operations.
6/30/98	1223267-AF(1)	Financial Installation Audit, Boston, MA - Management is reviewing procedures and providing training to ensure proper financial management of the Bulk Mail Entrance Unit.
08/13/98	1223405-AF(1)	Financial Installation Audit, Washington, DC - Management is implementing the Meter Accounting Tracking System. Procedures are being developed for the Bulk Mail Entrance Unit to strengthen internal controls.
07/01/98	1223482-AF(1)	Financial Installation Audit, New London, CT - Management is developing procedures and conducting training in business mail acceptance.
8/19/98	1223262-AF(1)	Financial Installation Audit, New London, CT - Management is developing procedures and conducting training in business mail acceptance.
06/01/98	1223708-AF(1)	Financial Installation Audit, Lancaster, CA - Management is implementing procedures in Bulk Mail Entrance Unit operations.
04/07/98	1229348-AF(1)	Financial Installation Audit, Conshohocken, PA - Management has begun implementing numerous Bulk Mail Entrance Unit procedures.
08/03/98	12405850-AF(1)	Financial Installation Audit, Sioux City, IA - Management is developing procedures to ensure proper financial management of the Bulk Mail Entrance Unit.

09/02/98	1222998-AF(1)	Financial Installation Audit, South Elgin, IL - Management is acquiring new equipment for Collect on Delivery operations. Training is being given in Bulk Mail Entrance Unit operations.
04/27/98	1223429-AF(1)	Financial Installation Audit, Severna Park, MD - Management is providing training to ensure proper administration of the Bulk Mail Entrance Unit.
07/02/98	1224025-AF(1)	Financial Installation Audit, Clearlake, CA - Management is providing training in business mail acceptance operations.
05/05/98	1229351-AF(1)	Financial Installation Audit, Temple, PA - Management is implementing procedures in business mail operations.
08/25/98	1224037-AF(1)	Financial Installation Audit, Haines, AK - Management is implementing procedures in business mail operations.
06/30/98	1245456-PA(3)	Commercial Mail Receiving Agencies, Long Beach District - Management agreed with the recommendations and will provide attention to improve controls.
02/13/98	1155587-RI(1)	Nonprofit Mailing, Boston, MA - Management has not implemented findings regarding the Nonprofit Permit System.
08/13/98	1223405-AF(1)	Financial Installation Audit, Washington, DC - Management is developing procedures for the BMEU to strengthen internal controls.
06/04/98	1225186-AF(1)	Financial Installation Audit, Atlanta, GA - Management is providing attention to ensure proper administration and collection of fees on mailings.
07/01/98	1245454-PA(3)	Commercial Mail Receiving Agencies, Van Nuys District - Management indicated that training will be provided.
07/28/98	1245455-PA(3)	Commercial Mail Receiving Agencies, San Diego District - Management is working to improve CMRA controls.
03/29/99	1261754-AF(1)	Financial Installation Audit, royal Oak, MI - Management is providing attention to internal controls in the BMEU.
2/26/99	1256273-AF(1)	Financial Installation Audit, Franklin Park, IL - Management is reviewing procedures and providing training for BMEU, employee accountabilities, postage due/business reply mail, post office box/caller service, and COD mail.

12/18/98	1256726-AF(1)	Financial Installation Audit, Mission Hills, CA - Management
		is providing attention to ensure proper administration of
		business mail acceptance procedures.

b) Inspection Service Reports:

Case/Report Number	Subject Title/Project Type	Location/Contract	Issue Date
011-1256279-AF(1)	A financial installation audit of a post office.		
011-1259853-AF(1)	A financial installation audit of a post office.		
011-1256430-AF(1)	A financial installation audit of a post office.		
011-1256584-AF(1)	A financial installation audit of a post office.		
052-1234653-PA(3)	Commercial Mail Receiving Agencies	Miramar, FL 33027	10/28/98
062-1260835-RI(1)	Standard Mail	Montgomery, AL 36119	11/16/98
069-1266708-RI(2)	Presort Bureaus	Los Angeles, CA 90058	12/18/98
069-1266708-RI(2)	Presort Bureaus	Orange, CA 92868	12/18/98
924-1254111-RI(1)	Presort Bureaus	Santa Ana, CA 92702	10/27/98
046-1245790-PA(2)	Business Mail Entry Units	Washington, DC 20066	11/24/98
006-1250049-RI(1)	Business Mail Entry Unit	Miami, FL 33152	12/23/98
064-1281435-RI(1)	Business Mail Entry Unit	Atlanta, GA 30304	03/15/99
066-1265079-RI(1)	Bulk Mail Acceptance Unit	Forest Park, IL 60130	12/10/98
069-1272194-RI(2)	Business Mail Entry Unit	Fort Lee, NJ 07024	02/22/99
924-1281479-RI(1)	Presort Bureaus	Trenton, NJ 08618	03/19/99
924-1257646-RI(1)	Bulk Mailing Entry Unit	Cleveland, OH 44101	12/01/98
AC-AR-99-001	Plant Verified Drop Shipment System	Postal-wide	9/28/99

IS 920-1207670- RI(1) and IS 069- 1296866-RI(1)	Investigation by inspectors - mailer knowingly underreported additional per-piece charges that were due the Postal Service.		
IS 924-1170790- RI(1)	The investigation that revealed that the mailer routinely understated a portion of the mail requiring additional postage.		
IS 064-1290439- RI(1)	Inspectors identified numerous mailings presented by a third-party mailer claiming unqualified discounts. Analysis showed that the mail was not presorted to the extent claimed.		
064-1289899-RI(1)	Business Mail Entry Unit	San Francisco, CA 94120	5/28/99
066-1284083-RI(1)	Business Mail Entry Unit	Denver, CO 80266	4/07/99
066-1286157-RI(1)	Business Mail Entry Unit	Fortuna, CA 95540	9/10/99
068-1275423-RI(1)	Business Mail Entry Unit	Boston, MA 02205	6/10/99
069-1278476-RI(1)	Bulk Mail Permits and Fees	Rocky Mount, VA 24151	3/05/99
923-1221400-RI(1)	Business Mail Entry Unit	Holliston, MA 01746	9/22/99
923-1274894-RI(1)	Business Mail Entry Unit	Richmond, VA 23232	4/26/99
924-1240141-RI(1)	Business Mail Entry Unit	Seattle, WA 98111	3/25/99
924-1266353-RI(1)	Business Mail Entry Unit	Seattle, WA 98134	3/25/99

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: April 10, 2000. Philadelphia, Pa.

61318